

May 24, 2012

VIA EMAIL

RE: DOCKET 10-51 "STRUCTURE AND PRACTICES OF THE VRS PROGRAM"

Sirs,

I am appalled by the suggestions of the RID about the FCC's Further Notice of Proposed Rulemaking (FNPRM). Not because of their intentions; but because of its implications and consequences.

I have been an interpreter for more than 10 years, 6 of them I have worked as a Video Interpreter. I have studied and carefully observe the Code of Professional Conduct. I passed the NIC written exam, took the NIC Performance Test and failed. I am sure it was not because of lack of skills (I passed the intent and content criteria); the problem is that I am a Spanish-speaking interpreter living in Puerto Rico. I had to make the choice between paying for the plane ticket to travel to the US and take the review to help me pass the test, or study by myself with absolutely no help or guidance and be able to pay the ticket to actually take the test. Many of my fellow interpreters go through the same struggle and suffer the same disadvantages.

I am an RID member, pay my dues; adhere to the same Code of Professional Conduct and yet the RID thinks that I am not good enough to do a job that very few NIC Certified interpreters are qualified to do: Spanish-ASL interpreting. Sure, there are 9,500 certified interpreters, but how many of them can interpret between a Spanish-speaking hearing and ASL Native consumer? I have been doing this for a long time, and on a **daily basis** NIC Certified Interpreters of all levels, transferred calls to me and other Spanish-speaking interpreters because they could not handle the calls. They didn't understand culture, accents, idiomatic expressions, regional signs, etc. The fact is that there ARE NOT enough certified interpreters that can satisfy the demand for Spanish-speaking consumers.

What will happen to those customers? According to the last census, Hispanics are the fastest growing minority in the US and in the future, might be the majority with a projected population of 132 million by the year 2050. The RID talks about Interpreter/Caller matches. What will be the option for the Hispanic Deaf and his family? A nationally certified interpreter that can hardly speak Spanish, but considers himself trilingual?

Don't get me wrong; I am all for regulating the profession, but it should be done in a fair manner. It is completely discriminatory to require an NIC Certification (which is done only in English) to allow me to do a job that is done in Spanish. Besides, it makes absolutely no sense. An NIC Certification is a wonderful tool and as soon as the RID/NIC provides a test in Spanish (taking in consideration the education level of the average Hispanic interpreter) I will take it.

I respect the intentions of the RID, and completely agree with the fact that "interpreting is the core function" of the Video Relay Service. I also agree with the RID's statement that "every call that is relayed requires that the interpreter understand at least two languages. They must be able to culturally mediate the interactive communication so that the dialogue is understood by all". On the other hand, I completely disagree with the assumption that the high level skill that this requires and is only obtained through experience and education is "most often demonstrated by nationally certified interpreters"¹. Nothing could be farther from the truth. Tell that to the Spanish-speaking consumer that tells me "oh,

¹ Letter from Janet L. Bailey RID/CG Docket No. 10-51 page 2

thank God they transferred me to you, you really speak Spanish!" Funny that the previous interpreter was an nationally certified interpreter that failed to culturally mediate and communicate, and that nationally certified interpreter WAS NOT understood by all.

I have nothing against nationally certified interpreters; they do a great job and are very valuable to our profession. I would never pretend to interpret in settings that I am not qualified to. That's part of our CPC (Code of Professional Conduct). The same is true for them. Don't pretend an NIC Certification qualifies you to interpret in Spanish. It doesn't!

Let us do our job and don't ask for completely unrelated qualifications to do it. The RID should do something about creating a certification in Spanish, and then we can talk. Test us, regulate us; but do it fairly. Think about the implications and consequences of this suggestion; think about all the Hispanic Americans you serve. Don't let a formality blind you from reality.

Sincerely,

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